

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

JOHNNY D. PENNINGTON)	
COMPLAINANT)	
)	
V.)	CASE NO.
)	2015-00260
KENTUCKY POWER COMPANY)	
DEFENDANT)	

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO KENTUCKY POWER COMPANY

Pursuant to 807 KAR 5:001, Kentucky Power Company ("Kentucky Power") is to file with the Commission the original and ten copies of the following information, with a copy to all parties of record. The information requested herein is due no later than March 10, 2016. Responses to requests for information shall be appropriately bound, tabbed and indexed. Each response shall include the name of the witness responsible for responding to the questions related to the information provided.

Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association or a governmental agency, be accompanied by a signed certification of the preparer or person supervising the preparation of the response on behalf of the entity that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

Kentucky Power shall make timely amendment to any prior response if it obtains information which indicates that the response was incorrect when made or, though

correct when made, is now incorrect in any material respect. For any request to which Kentucky Power fails or refuses to furnish all or part of the requested information, it shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention should be given to copied material to ensure that it is legible. When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request. When filing a paper containing personal information Kentucky Power shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Refer to the Affidavit of John A. Rogness III in Support of Kentucky Power Company's Motion to Dismiss Complaint or in the Alternative Motion for Summary Judgment ("Rogness Affidavit"), pages 3–4, paragraphs 9, 10, and 12. Provide any recording or transcript of Complainant Johnny D. Pennington's conversation with the customer service representative.

2. Refer to the Rogness Affidavit, page 3, paragraph 11.

- a. Describe the company practice with which the customer service representative's inquiry was consistent.

- b. If the company practice is written, provide a copy.

3. If Kentucky Power has a written practice or policy concerning the re-connection of electrical service following unauthorized usage, provide a copy of the practice or policy.

4. If Kentucky Power has a written practice or policy concerning the connection or re-connection of electrical service for landlords or rental property, provide a copy of the practice or policy.

James W. Gardner for

James W. Gardner
Acting Executive Director
Public Service Commission
P.O. Box 615
Frankfort, KY 40602

DATED **FEB 25 2016**

cc: Parties of Record

Johnny D Pennington
736 Hager Branch
East Point, KENTUCKY 41216

Johnny D Pennington
P.O. Box 152
Meally, KENTUCKY 41234

Johnny D Pennington
876 Buffalo Road
Meally, KENTUCKY 41234

*Kentucky Power Company
101 A Enterprise Drive
P. O. Box 5190
Frankfort, KY 40602

*Kentucky Power Company
Kentucky Power Company
101 A Enterprise Drive
P. O. Box 5190
Frankfort, KY 40602

*Honorable Mark R Overstreet
Attorney at Law
Stites & Harbison
421 West Main Street
P. O. Box 634
Frankfort, KENTUCKY 40602-0634